

## Section 1. Registration Information

### Source Identification

---

Facility Name:	Eagle US 2 LLC, Lake Charles Plant
Parent Company #1 Name:	Eagle US 2 LLC
Parent Company #2 Name:	

### Submission and Acceptance

---

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	11-Mar-2021
Postmark Date:	11-Mar-2021
Next Due Date:	11-Mar-2026
Completeness Check Date:	11-Mar-2021
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

### Facility Identification

---

EPA Facility Identifier:	1000 0008 2082
Other EPA Systems Facility ID:	70669PPGNDCOL
Facility Registry System ID:	

### Dun and Bradstreet Numbers (DUNS)

---

Facility DUNS:	8086506
Parent Company #1 DUNS:	1344803
Parent Company #2 DUNS:	1344803

### Facility Location Address

---

Street 1:	1300 PPG Drive
Street 2:	
City:	Westlake
State:	LOUISIANA
ZIP:	70669
ZIP4:	
County:	CALCASIEU

### Facility Latitude and Longitude

---

Latitude (decimal):	30.224028
Longitude (decimal):	-093.283194
Lat/Long Method:	Interpolation - Other
Lat/Long Description:	Facility Centroid
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

## Owner or Operator

---

Operator Name:	Eagle US 2 LLC
Operator Phone:	(337) 708-4500

## Mailing Address

---

Operator Street 1:	P.O. Box 1000
Operator Street 2:	
Operator City:	Lake Charles
Operator State:	LOUISIANA
Operator ZIP:	70602
Operator ZIP4:	1000
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

## Name and title of person or position responsible for Part 68 (RMP) Implementation

---

RMP Name of Person:	Daniel Pund
RMP Title of Person or Position:	Process Safety Compliance Supt.
RMP E-mail Address:	dpund@westlake.com

## Emergency Contact

---

Emergency Contact Name:	Rocky DeRoche
Emergency Contact Title:	Shift Superintendent
Emergency Contact Phone:	(337) 708-4340
Emergency Contact 24-Hour Phone:	(337) 912-2638
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	Rderoche@westlake.com

## Other Points of Contact

---

Facility or Parent Company E-mail Address:
Facility Public Contact Phone:
Facility or Parent Company WWW Homepage Address:

## Local Emergency Planning Committee

---

LEPC:	Calcasieu Parish LEPC
-------	-----------------------

## Full Time Equivalent Employees

---

Number of Full Time Employees (FTE) on Site:	1149
FTE Claimed as CBI:	

## Covered By

---

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	Yes

Air Operating Permit ID:

1929-VO,2229-VO

## OSHA Ranking

---

OSHA Star or Merit Ranking:

## Last Safety Inspection

---

Last Safety Inspection (By an External Agency)  
Date:

29-Jul-2020

Last Safety Inspection Performed By an External  
Agency:

US Coast Guard

## Predictive Filing

---

Did this RMP involve predictive filing?:

## Preparer Information

---

Preparer Name:

Daniel Pund

Preparer Phone:

(337) 708-4095

Preparer Street 1:

1300 PPG Drive

Preparer Street 2:

Preparer City:

Westlake

Preparer State:

LOUISIANA

Preparer ZIP:

70602

Preparer ZIP4:

1000

Preparer Foreign State:

Preparer Foreign Country:

Preparer Foreign ZIP:

## Confidential Business Information (CBI)

---

CBI Claimed:

Substantiation Provided:

Unsanitized RMP Provided:

## Reportable Accidents

---

Reportable Accidents:

See Section 6. Accident History below to determine  
if there were any accidents reported for this RMP.

## Process Chemicals

---

Process ID:

1000115155

Description:

Alkalies and Chlorine

Process Chemical ID:

1000143967

Program Level:

Program Level 3 process

Chemical Name:

Chlorine

CAS Number:

7782-50-5

Quantity (lbs):

37000000

CBI Claimed:

Flammable/Toxic:

Toxic

Process ID:	1000115155
Description:	Alkalies and Chlorine
Process Chemical ID:	1000143968
Program Level:	Program Level 3 process
Chemical Name:	Vinyl chloride [Ethene, chloro-]
CAS Number:	75-01-4
Quantity (lbs):	69000000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000115155
Description:	Alkalies and Chlorine
Process Chemical ID:	1000143969
Program Level:	Program Level 3 process
Chemical Name:	Ethyl chloride [Ethane, chloro-]
CAS Number:	75-00-3
Quantity (lbs):	15000000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000115155
Description:	Alkalies and Chlorine
Process Chemical ID:	1000143970
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	80000
CBI Claimed:	
Flammable/Toxic:	Toxic

## Process NAICS

Process ID:	1000115155
Process NAICS ID:	1000116568
Program Level:	Program Level 3 process
NAICS Code:	32518
NAICS Description:	Other Basic Inorganic Chemical Manufacturing

Process ID:	1000115155
Process NAICS ID:	1000116569
Program Level:	Program Level 3 process
NAICS Code:	325998
NAICS Description:	All Other Miscellaneous Chemical Product and Preparation Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000093126

Percent Weight:	
Physical State:	Gas liquified by refrigeration
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	Administrative Controls

## Section 3. Toxics: Alternative Release

### Toxic Alter ID: 1000099010

---

Percent Weight:	
Physical State:	Gas liquified by refrigeration
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

#### Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	Administrative Controls

#### Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	Yes
Other Type:	

### Toxic Alter ID: 1000099011

---

Percent Weight:	
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

#### Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	Administrative Controls

#### Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	

Emergency Shutdown:

Yes

Other Type:

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000070186

---

Model Used:	EPA's RMP*Comp(TM)
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:	
Other Type:	Administrative Controls

Flammable Worst ID: 1000070187

---

Model Used:	EPA's RMP*Comp(TM)
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:	
Other Type:	Administrative Controls



Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000065662

Model Used:	EPA's RMP*Comp(TM)
Passive Mitigation Considered	
Dikes:	
Fire Walls:	
Blast Walls:	
Enclosures:	
Other Type:	
Active Mitigation Considered	
Sprinkler System:	Yes
Deluge System:	
Water Curtain:	
Excess Flow Valve:	
Other Type:	Vapor Detectors, Automatic Shutdown Systems

## Section 6. Accident History

No records found.

## Section 7. Program Level 3

### Description

---

No description available.

### Program Level 3 Prevention Program Chemicals

---

Prevention Program Chemical ID: 1000123465  
Chemical Name: Ammonia (anhydrous)  
Flammable/Toxic: Toxic  
CAS Number: 7664-41-7

Process ID: 1000115155  
Description: Alkalies and Chlorine  
Prevention Program Level 3 ID: 1000098523  
NAICS Code: 32518

Prevention Program Chemical ID: 1000123462  
Chemical Name: Chlorine  
Flammable/Toxic: Toxic  
CAS Number: 7782-50-5

Process ID: 1000115155  
Description: Alkalies and Chlorine  
Prevention Program Level 3 ID: 1000098523  
NAICS Code: 32518

Prevention Program Chemical ID: 1000123464  
Chemical Name: Ethyl chloride [Ethane, chloro-]  
Flammable/Toxic: Flammable  
CAS Number: 75-00-3

Process ID: 1000115155  
Description: Alkalies and Chlorine  
Prevention Program Level 3 ID: 1000098523  
NAICS Code: 32518

Prevention Program Chemical ID: 1000123463  
Chemical Name: Vinyl chloride [Ethene, chloro-]  
Flammable/Toxic: Flammable  
CAS Number: 75-01-4

Process ID: 1000115155  
Description: Alkalies and Chlorine  
Prevention Program Level 3 ID: 1000098523  
NAICS Code: 32518

## Safety Information

---

Safety Review Date (The date on which the safety information was last reviewed or revised): 19-Feb-2021

## Process Hazard Analysis (PHA)

---

PHA Completion Date (Date of last PHA or PHA update): 02-Feb-2021

## The Technique Used

---

What If:  
Checklist:  
What If/Checklist:  
HAZOP: Yes  
Failure Mode and Effects Analysis:  
Fault Tree Analysis:  
Other Technique Used:  
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update): 30-Jan-2022

## Major Hazards Identified

---

Toxic Release: Yes  
Fire: Yes  
Explosion: Yes  
Runaway Reaction:  
Polymerization:  
Overpressurization: Yes  
Corrosion: Yes  
Overfilling: Yes  
Contamination: Yes  
Equipment Failure: Yes  
Loss of Cooling, Heating, Electricity, Instrument Air: Yes  
Earthquake:  
Floods (Flood Plain): Yes  
Tornado: Yes  
Hurricanes: Yes  
Other Major Hazard Identified:

## Process Controls in Use

---

Vents: Yes  
Relief Valves: Yes  
Check Valves: Yes  
Scrubbers: Yes  
Flares:  
Manual Shutoffs: Yes  
Automatic Shutoffs: Yes  
Interlocks: Yes  
Alarms and Procedures: Yes  
Keyed Bypass:  
Emergency Air Supply: Yes

Emergency Power:	
Backup Pump:	Yes
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	Yes
Quench System:	
Purge System:	Yes
None:	
Other Process Control in Use:	

### Mitigation Systems in Use

---

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	Yes
None:	
Other Mitigation System in Use:	

### Monitoring/Detection Systems in Use

---

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	

### Changes Since Last PHA Update

---

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	Yes
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	Yes
None:	
Other Changes Since Last PHA or PHA Update:	

### Review of Operating Procedures

---

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	10-Feb-2021
--	-------------

### Training

---

Training Revision Date (The date of the most recent review or revision of training programs):	16-Feb-2021
---	-------------

## The Type of Training Provided

---

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based training

## The Type of Competency Testing Used

---

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

## Maintenance

---

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 24-Feb-2021

Equipment Inspection Date (The date of the most recent equipment inspection or test): 02-Feb-2021

Equipment Tested (Equipment most recently inspected or tested): Vessel

## Management of Change

---

Change Management Date (The date of the most recent change that triggered management of change procedures): 24-Feb-2021

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 07-Jan-2021

## Pre-Startup Review

---

Pre-Startup Review Date (The date of the most recent pre-startup review): 24-Feb-2021

## Compliance Audits

---

Compliance Audit Date (The date of the most recent compliance audit): 09-Nov-2018

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 01-Dec-2026

## Incident Investigation

---

Incident Investigation Date (The date of the most recent incident investigation (if any)): 17-Feb-2021

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): 01-Aug-2022

## Employee Participation Plans

---

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 08-Feb-2021

## Hot Work Permit Procedures

---

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 29-Jan-2021

## Contractor Safety Procedures

---

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 16-Feb-2021

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): 04-Mar-2021

## Confidential Business Information

---

CBI Claimed:

## Section 8. Program Level 2

No records found.



## Section 9. Emergency Response

### Written Emergency Response (ER) Plan

---

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

### Emergency Response Review

---

Review Date (Date of most recent review or update of facility's ER plan): 18-Mar-2020

### Emergency Response Training

---

Training Date (Date of most recent review or update of facility's employees): 31-Mar-2020

### Local Agency

---

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Calcasieu Parish OEP

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (337) 721-3800

### Subject to

---

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112: Yes

RCRA Regulations at CFR 264, 265, and 279.52: Yes

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: Yes

State EPCRA Rules or Laws: Yes

Other (Specify):

## Executive Summary

### EXECUTIVE SUMMARY

#### CHLORINE & CHLORINATED HYDROCARBON PROCESSES

EPA Facility ID #: 1000 0008 2082

LDEQ Facility ID: 1255

Eagle US 2 LLC, Lake Charles, LA

#### Accidental Release Prevention and Emergency Response Policies.

The Eagle US 2 LLC Lake Charles facility complies with OSHA's Process Safety Management Rule (29 CFR 1910.119), EPA's Risk Management Program Rule (40 CFR Part 68), other applicable state and federal EPA regulations, and applicable Coast Guard and Department of Transportation requirements. Eagle US 2 LLC also follows the Responsible Care; Codes of Management Practice, including the Responsible Care; Community Awareness Code of Management Practice, and Eagle US 2 LLC's own Community Awareness and Emergency Response (CAER) Policy to assure emergency preparedness and foster community right-to-know. Eagle US 2 LLC's CAER Policy requires each manufacturing plant to have a pro-active community awareness and emergency response program to handle emergencies that might happen in that facility. All of these activities form an integral part of Eagle US 2 LLC's overall Environment, Health and Safety Policy, whose goal is "to manufacture, sell, and distribute products worldwide in a manner that is safe and protective of our employees, neighbors, customers, other stakeholders, and the environment."

#### Regulated substances handled:

Eagle US 2 LLC's Lake Charles facility is part of the ChlorAlkali & Derivatives Strategic Business Unit of Eagle US 2 LLC Corporation. The facility is a fully integrated process that produces chlorine, caustic soda and various chlorinated hydrocarbons. These chemicals are utilized in many areas such as water treatment, food processing, medicines, plastics and Freon substitutes. Chlorine, ethyl chloride, vinyl chloride and ammonia are manufactured or stored in quantities that meet EPA Risk Management Program threshold values.

#### General accidental release prevention program and chemical specific prevention steps:

Personnel, environmental, health and safety measures are included in all phases of the Eagle US 2 LLC Lake Charles operation. Detailed engineering and design standards are used. These standards may include national codes and standards, quality assurance inspections, over pressure protection systems, flammable and toxic gas detectors, emergency shutdown systems, a fire water system, computer controls for the processes and a procedure to systematically analyze potential hazards in each new process.

Employees at the facility receive job-appropriate training. The training program includes periodic retraining, as appropriate.

Safety, environmental, operating and training procedures are subject to periodic reviews and updates. Additional systems are in place to review proposed changes and assure that any new training requirements are met. Another system assures a detailed review for hazards in each operating unit on a prescribed frequency. All of the training and updating procedures are monitored.

Eagle US 2 LLC's Lake Charles facility has an array of maintenance and inspection programs that minimize the possibility of equipment or piping failures. Periodic equipment inspections are performed to assure the equipment integrity. The inspections utilize recognized codes and procedures that are followed by specially trained individuals. Preventive and predictive maintenance programs are utilized and can include vibration monitoring, infrared imaging, inspections by independent experts, inspections by insurance specialists and root-cause analysis investigations. Piping systems are inspected and tested with X-rays and hydrostatic tests prior to operation. The piping is monitored by a variety of methods to assure its condition. Maintenance personnel are included in many of the training and testing programs that the operators utilize. Additional training and procedures have been developed for activities that are specific to maintenance.

#### Five-year accident history:

No accidents have occurred within the past five years, therefore no accidents are to be reported in the executive summary.

Notification requirements are defined and assigned to specific individuals in the plant. Some individuals work a rotating shift

allowing notifications 24 hours a day. Other people are available at any time. Eagle US 2 LLC has a corporate emergency system that can be accessed at any time. This corporate system has additional resources for use in an emergency.

Planned changes to improve safety:

Eagle US 2 LLC is committed to the process of continuous improvement. This commitment extends beyond production into the environmental and safety aspects of our operations.